

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
)
v.) Criminal No. 04-51 E
)
GARY DEAN RHOADES)

MOTION TO AMEND CONDITIONS OF BOND

AND NOW, comes the defendant, GARY DEAN RHOADES, by his attorney, Thomas W. Patton, Assistant Federal Public Defender, and respectfully files this Motion to Amend Conditions of Bond, and in support thereof sets forth as follows:

1. Mr. Rhoades has pled guilty to both mail fraud and wire fraud in violation of Title 18, U.S.C. §§ 1341 and 1343.
2. This Court sentenced Mr. Rhoades on June 22, 2005, to 46 months imprisonment to be followed by three years of supervised release. The Court allowed Mr. Rhoades to self-report to the Bureau of Prisons and continued his supervision until his report date on the same bond conditions originally imposed by Magistrate Judge Baxter.
3. On November 18, 2004, Magistrate Judge Baxter released Mr. Rhoades on a \$20,000 recognizance bond with the following conditions:
 - a. report to Pretrial Services on a weekly basis by phone or in person as it requires;
 - b. maintain or actively seek employment;
 - c. travel restricted to the Southern District of Ohio and Western District of Pennsylvania.
4. Mr. Rhoades has complied with all of the conditions of his bond.
5. Mr. Rhoades respectfully requests that this Court amend his bond to allow him to travel to Gambrill, Maryland, and Durham, North Carolina, to visit each of his sons, from

September 23, 2005 to September 26, 2005.

6. United States Pretrial Services Officer Charmaine Odom does not object to this motion.

7. Assistant United States Attorney Marshall Piccinini does not object to this motion.

WHEREFORE, the defendant, GARY DEAN RHOADES, respectfully requests that this Honorable Court Amend the Conditions of his Bond to allow him to travel to Gambrill, Maryland, and Durham, North Carolina.

Respectfully submitted,

/s/ Thomas W. Patton
Thomas W. Patton
Assistant Federal Public Defender
PA I.D. No. 88653